

I have been in broadcasting for over 30 years. I am a professional broadcast engineer by trade, and presently hold the position of VP and Chief Operator of a commercial television station. I also edit and publish a monthly magazine for blind radio enthusiasts (since 1985), hold a position of Communication Officer for our county E.M.A., and Co-chair the Lima/Allen County E.A.S. district. From this experience I feel I can speak not only for the broadcaster, but also the radio listener. I am an avid listener of domestic AM and FM radio.

The "Telecommunications Act of 1996" has put the AM radio dial into a state of disarray in several ways. With stations being consolidated, and staffs reduced, comes a loss of public service and technical ability. It is not uncommon to hear at least one station on the AM dial not operating according to their license, and often causing interference to other stations operating legally. I not only hear these stations, but others hear them and routinely point out the offenders in DX lists, and in comments to the magazine I publish. Sadly, the FCC has neither the manpower nor the budget to deal with this problem. I can not recall in my forty years of listening to radio having heard so many stations operating outside of rules defined in FCC Part 73.

It is known that the IBOC transmission platform has bandwidth flaws. As pointed out in comments by Clear Channel, a station is readable with as little as .2 mv/m of signal along side another station with as much as 5 mv/m of signal. However, when the adjacent channel station with its 5 mv/m of signal transmitted using IBOC, the .2 mv/m signal disappeared into a void of noise. Obviously there is concern for IBOC's interference issues as it was suggested it be used only for daytime transmissions.

Besides the obvious interference issues of daytime, comes concerns for nighttime. Should a station not turn off the IBOC transmissions at sunset, the interference has the potential for ruining four or many more stations on adjacent channels. With engineering staffs overworked, and in many cases contracted, there is not the attention paid to interference issues. One can successfully argue that if stations can not change power or pattern at their assigned times, how can you be sure IBOC will be turned off at local sunset, and returned at sunrise? Since the station(s) nor the Commission can police this issue reasonably the danger to the public is high.

This interference problem impacts the public's ability to listen freely to existing stations. It impacts the public's ability to listen to weak signals, especially in rural America. It is most damaging during times of emergency or concern. The Commission can not take away the ability of the public to listen to stations just because of technical advancement. The Commission must be very concerned for interference especially when it may impact the E.A.S. in many communities.

I would also like to point out the potential for interference to stations in adjacent countries. The Commission should be very concerned for harm caused to AM broadcasters in Canada, Mexico, and even Cuba. Should AM stations in the U.S. cause unacceptable interference to stations in other countries, the issue could cause problems or even retaliation (Cuba) which would further impact the listeners of AM radio at present.

I also feel that iBiquity fee for use in addition to the cost of equipment is a poor idea. I support iBiquity's right to charge for their equipment at a price where they can make profit and pay for past R&D. However license fee to use this equipment after it has been purchased, (especially if the Commission

mandates its use), is monopolistic and is a conflict of interest between government and private business.

I would like to discourage the Commission's acceptance of iBiquity's IBOC. The people who will be most impacted by IBOC problems will be the public who listens to radio. To ask people to accept interference does not justify the advancement of this technology, especially when there is nothing wrong with the present method of delivery! People listen to radio for program content and interest, and not because it simply sounds better.

I would urge the Commission to look at alternate spectrum. Perhaps the longwave band could be utilized for transmissions of iBiquity's digital platform. If the platform is as good as it has been promoted then the manufacturers of receivers and the public will demand it. Unlike other parts of the world, there are no commercial broadcast stations operating in the longwave band in North America. The Commission will have less interference issues to work out with existing services required by the public. The Commission will also not have any issues with stations delivering emergency messages to the public via E.A.S.